

IN THE MATTER OF 1998 BIENNIAL REGULATORY REVIEW-AMENDMENT OF PART 97
OF THE COMMISSION'S AMATEUR SERVICE RULES, FCC WT DOCKET 98-143.

RECEIVED
JUL 1 9 1998
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1. I must compliment the Commission and its staff in the first realistic appraisal of Amateur Service Rules in several years. Your realistic assessment of the situation and proposed solutions is right on.
2. The return to a simple division of amateur license classes should return to the amateur community less diverse, and more easily definable levels of skill, knowledge, and reverse the trend of egotistic accomplishment. We are "Amateur" only in name, for anyone who masters the skills required by amateur operation is anything but except in name. This is "true" at any level presently in use. Your plan recognizes this, and is to be commended.
3. Your recognition that "CW" skill as a requirement for competency in today's world no longer holds true is also to be commended. As an operation mode, it has its place. We all recognize that, and having a basic ability is something all of us should possess, albeit one that may or may not be necessary to be an "amateur" in today's world of electronics. I have no quarrel with those that believe some CW skill is needed, however, I also believe that as a hobby, amateur radio should only require sufficient knowledge of rules and regulations, technical skill, and operational competency to assure compliance with the above. Just being a skilled CW operator does not of itself assure the other. We must continually strive to improve ourselves, and the recognition of the "self-regulating ability of the service" indicates that it is indeed true. If one wishes to operate in a mode, one becomes proficient in that mode. If portions of an operating band require that skill, then one acquires that skill needed to operate. I have always used the old saw that "I didn't need to demonstrate my ability to talk (verbalize orally) to get a license, why should I have to demonstrate my ability to use the "code" (CW) to get a license"? The need to demonstrate that mode is long past. If it is felt that some level of operational competency in CW is needed, (or to comply with WW requirements), then so be it! The level of competency should be no more than basic, and that too, is questionable. Unless the Commission follows the precepts that commercial licenses did, that to operate "phone" or "Radar" or "CW" one demonstrated that skill, it follows that tests in the various operational modes the amateur uses should be used. However, that is somewhat unrealistic, and your proposals to simply utilize greater levels of knowledge to gravitate to a higher class of license, using written responses to demonstrate those skills makes much more sense.

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4. The Class of license should be as you have proposed, require a demonstratable knowledge of technical and operationl ability persuant to that class of license. Entrance level licensing should be consistant with knowledge needed to safely and competantly operate. It should be comparable to that required to operate a motor vehicle, sufficient to ensure knowledge of rules and regulations, technical ability, and to ensure compliance. As a motor vehicle licensee it is not necessary to demonstrate improved ability, but this seems to be "apriori" in that simply operating the vehicle over a period of time does bring improved skill and ability. So it is with amateur radio. I believe this should be recognized and accepted. Yes, in some cases no improvement to meet the requirements of operating a vehicle in an ever increasingly hazardous envoirnement can be met this way, but generally the operator does increase his competence by operating in the real world. It is the same in amateur radio. The simple procedure of operating does improve our abilities, and usually results in the operator striving to improve further by reading technical materials, or actural "hands-on" building of equipment or simple circuits, wiring, cabling, all skills needed in the amateur world.

5. I support no "CW" or code ability for an entrance level. The present "no code" level identified as "technican" satisfies most of the requirements, however, I believe the failure to encourage the upgrading of license is due more to the lack of experience the no-code technican has simply operating in the world above 30 MHz. I believe that if exposed to a wider variety of operating modes at lower frequencies, most operators will upgrade to a higher level to increase their operating enjoyment. Lets face facts, most of the so called "no-code techs" are as knowledgeable of state of the art operating modes and techniques (or in many cases, MORE knowledgable, than many "old timers" with great CW skills. Why should a hobby be so restricted that we exclude them? We shouldn't, and limited operating authority could correct that. It is after all a hobby, and it should be available to anyone with a modicum of skill and ability, to enjoy and at the same time achieve competency levels equivilant to those with higher class licenses and authority.

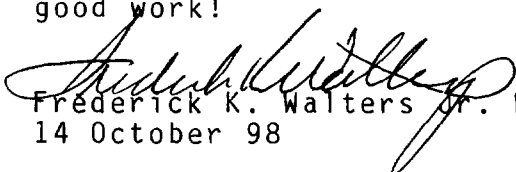
6. I have been a "code-plus tech" for many years. I have not sought greater licensing because I enjoy what I do, and the modes I operate. Upgrading to me is not as important as being skilled at what I enjoy doing. I believe that part of that "feeling" is engendered by the "elitist" attitude of much of the amateur community, a community that although licensed as highly CW proficient, does not demonstrate that ability, or practice what "they" profess as important. Your proposals should correct that practice.

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7. I believe that a return to simple, three class system is a good idea. Why complicate a system when the system does not need complicating. The Entrance level should be "no-code" but should have limited operational authority to satisfy the hobbist, including the present 10 meter operation. This will get their feet wet, and encourage upgrading as needed. I support the grandfathering of "code-plus" techs to the "general" class license. I am not opposed to moderate CW requirements, mostly to satisfy international agreements, but would encourage removing the demonstration of "mode" to obtain a license. This requirement should be replaced with more emphasis on technical requirements and rules and regulations, and implied skill at operating by questions directed to that ability in the exams. I believe the up-grading requires more complex and exacting exam elements. As this service is a hobby with the potentials needed in the emergency environment, we have a need to provide operating leniancy to provide these important public services. We should not restrict this ability by an "elitist" attitude. Everyone should be allowed to participate in this important element of the hobby, both legally, and actually.

8. I hope my comments will be helpful, and as indicated, I support the commissions viewpoints, as I understand them. Please keep up the good work!


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